

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION

|                                   |   |                        |
|-----------------------------------|---|------------------------|
| IN RE: KENNETH ALLEN PENDERGRASS, | { | CHAPTER 13             |
|                                   | { |                        |
|                                   | { |                        |
| DEBTOR(S)                         | { | CASE NO. R17-42492-MGD |
|                                   | { |                        |
|                                   | { | JUDGE DIEHL            |

**SUPPLEMENTAL OBJECTION TO CONFIRMATION**

COMES NOW MARY IDA TOWNSON, TRUSTEE herein, and objects to Confirmation of the plan for the following reasons:

1. The Chapter 13 petition fails to include a debt owed to National Title Pawn of Dalton - Walnut, in violation of Bankruptcy Rule 1007(a)(1) and 11 U.S.C. Section 1325(a)(3).

2. The proposed plan fails to provide for the treatment of National Title Pawn of Dalton - Walnut. However, said creditor has filed a secured claim.

WHEREFORE, the Trustee moves the Court to inquire into the above objections, deny Confirmation of this Debtor's (s') Plan and to dismiss the case; or, in the alternative, convert the case to one under Chapter 7.

February 7, 2018

/s/  
K. Edward Safir, Attorney  
for Chapter 13 Trustee  
GA Bar No. 622149

Mary Ida Townson, Chapter 13 Trustee  
Suite 2200 - 191 Peachtree Street, N.E.  
Atlanta, GA 30303-1740  
(404) 525-1110  
[eds@atlch13tt.com](mailto:eds@atlch13tt.com)

R17-42492-MGD

CERTIFICATE OF SERVICE

This is to certify that I have this day served

DEBTOR(S) :

KENNETH ALLEN PENDERGRASS  
1807 MALONE DRIVE  
DALTON, GA 30720-5649

ATTORNEY FOR DEBTOR(S) :

RICKMAN & ASSOCIATES, PC  
SUITE 200  
1755 NORTH BROWN ROAD  
LAWRENCEVILLE, GA 30043

in the foregoing matter with a copy of this pleading by  
depositing in the United States Mail a copy of same in a  
properly addressed envelope with adequate postage thereon.

This 7th day of February 2018

/s/

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K. Edward Safir, Attorney  
for Chapter 13 Trustee  
GA Bar No. 622149

Mary Ida Townson, Chapter 13 Trustee  
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